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March 3, 2008

BY FAX - 212-803-7949

Honorable P. Kevin Castel
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Kathleen G. Cully v. CIFG Holding, et al.
07 CIV. 8195 (PKC)

Dear Judge Castel:

We represent the entity defendants in this action. Counsel for plaintiff and the individual defendant, Jacques R. Rolfo, join in this request.

The parties respectfully request an extension of time to complete fact discovery from the date in the Case Management Plan, March 19, 2008, to April 30, 2008. This is the first such request.

April 30 is the date by which expert discovery shall be complete. The parties have conferred and agreed that they will not use any experts, except as to applicable French law. Accordingly, the current schedule in the Plan for the pretrial submissions will not be affected by this adjournment.

This request is necessitated by the fact that electronic document discovery has taken longer than expected due to the volume of documents kept electronically by both sides. For example, an electronic search of files of only seven "custodians" for an agreed-on list of "key words" had located more than 400,000 documents at defendant's New York offices, which are being reviewed and produced on a "rolling" basis. Plaintiff also had to review thousands of documents of her own.

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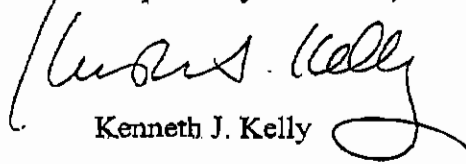
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The date for ~~fact~~ completing fact discovery set forth in paragraph 5 of the CMO and Scheduling Order is extended to April 30, 2008. In all other respects the CMO and Scheduling Order remains in place.
SO ORDERED
J. J. [Signature]
3-4-08

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Thank you for your consideration of this request.

Respectfully submitted,


Kenneth J. Kelly

Enclosure

cc: Anne L. Clark, Esq.
Counsel for Plaintiff (by fax)

Alan Arkin, Esq.
Counsel for Defendant Rolfo (by fax)

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